UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

SEP - 4 2014

Town of Cheshire
Department of Public Works/Engineering
Attn: Walter J. Garcarz, Operations Manager, Town Engineer
Room 213 Cheshire Town Hall
84 South Main Street
Cheshire, Connecticut 06410

Re: PCB Alternative Decontamination and Risk-Based Disposal Approval under 40 CFR § 761.61(c) and § 761.79(h)
Cheshire Water Pollution Control Plan

Dear Mr. Garcarz:

This is in response to the Town of Cheshire ("the Town") Notification[1] for approval of a proposed PCB cleanup at the Cheshire Water Pollution Control Plan located at 1325 Cheshire Street in Cheshire, Connecticut. Caulk and/or paint has been identified in the Influent Pump Station Building, the Digestion Control Building, and the Operations Building (together, "the Site") with PCB concentrations that exceed the allowable PCB levels under the federal PCB regulations at 40 CFR § 761.20 and § 761.62. Specifically, caulk and paint containing PCB concentrations at greater than or equal to ("≥") 50 parts per million ("ppm") have been identified at the Site.

To address PCB caulk and paint, and PCB-contaminated building substrates, the Town has submitted a PCB plan under 40 CFR § 761.61(c) and § 761.79(h) that includes the following proposed activities:

- Remove *PCB bulk product waste* (e.g., PCB paint and caulk and associated window, door, and louver systems and certain porcelain panels, capstones and flashing) and dispose of as ≥ 50 ppm *PCB bulk product waste* in accordance with 40 CFR § 761.62

[1] Information was prepared by AECOM on behalf of the Town of Cheshire to satisfy the requirements under 40 CFR § 761.61(c) and § 761.79(h). Information was submitted dated March 28, 2014 (Building Materials Remedial Action Plan); July 28, 2014 (response to EPA comments dated May 14, 2014); August 25, 2014 (emails response to EPA comments); August 26, 2014 (emails response to EPA comments); August 28, 2014 (email revised Table 2); and, September 2, 2014 (email revised Table 2). These submittals shall be referred to as the "Notification".

- Encapsulate with a coating or a solid barrier, exterior brick and concrete sills/foundations, and interior CMU and concrete with PCB concentrations greater than (" >") 1 ppm

- Demolish certain painted walls located in the Influent Pump Station Building and dispose in accordance with 40 CFR § 761.62

- Decontaminate certain *non-porous surfaces* (i.e., exterior fascia panels located on the Digestion Control and Operations Buildings) in accordance with 40 CFR § 761.79

- Remove PCB-contaminated soils and asphalt with greater than (">") 1 ppm but less than ("<") 50 ppm PCBs and dispose in accordance with 40 CFR § 761.61(a)(5)(i)(B)(*2*)(*ii*)

- Conduct verification sampling to confirm PCB concentrations at the Site and to support the efficacy of the encapsulation process

- Implement long term maintenance and monitoring of the encapsulated areas

- Record a deed notice as PCB concentrations > 1 ppm will remain at the Site.

The Town has determined that certain caulks and paints which have PCB concentrations at < 50 ppm, meet the criteria for an *Excluded PCB Product* under § 761.3. Under the PCB regulations, *Excluded PCB Products* are authorized for use and thus there is no requirement for removal of the caulk or paint. However, the Notification indicates that these materials will be removed and disposed of under the Connecticut Department of Energy and Environmental Protection ("CTDEEP") requirements.

Based on the EPA's review, the information provided in the Notification meets the requirements under 40 CFR § 761.61, § 761.62, and § 761.79(h) for cleanup and disposal of *PCB bulk product waste* and *PCB remediation waste*. EPA finds that the proposed encapsulation of PCB-contaminated *porous surfaces* with an epoxy coating system or a solid barrier should effectively prevent direct exposure of these PCB surfaces to building users.

The Town also has proposed a deviation from the verification sampling frequency requirements for *non-porous surfaces* (i.e., exterior fascia panels) and *porous surfaces* (i.e., exterior brick located behind fascia panel soffit caulk). Given the data collected to date and the proposed cleanup plan, EPA finds that the proposed verification sampling plan is adequate to determine if the PCB cleanup standards of less than or equal to ("≤") 10 µg/100 cm^2 and ≤ 1 ppm have been met.

EPA has determined that the encapsulation of PCB-contaminated *porous surfaces* and the alternative sampling as described in the Notification will not pose an unreasonable risk to health or the environment and EPA may approve the encapsulation and alternative sampling under 40 CFR § 761.61(c). The Town may proceed with its project in accordance with 40 CFR § 761.61(c); § 761.62; § 761.79(h); its Notification; and this Approval, subject to the conditions of Attachment 1.

Under this Approval, EPA is reserving its right to require additional mitigation measures should the results of the initial or long-term sampling indicate that the PCBs remaining at the Site pose an unreasonable risk of injury to health or the environment.

Questions and correspondence on this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100 (OSRR07-2)
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

James T. Owens, III
Director, Office of Site Remediation & Restoration

cc: Malcolm Beeler, AECOM
Gary Trombly, CTDEEP
File

Attachment 1: Approval Conditions
Attachment 2: Regulated Materials, Verification Sampling and Remedial Actions

ATTACHMENT 1

PCB ALTERNATIVE DECONTAMINATION AND RISK-BASED DISPOSAL APPROVAL CONDITIONS
CHESHIRE WATER POLLUTION CONTROL PLANT
1325 CHESHIRE STREET
CHESHIRE, CONNECTICUT

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located in and adjacent to the Influent Pump Building, the Digestion Control Building, and the Operations Building (together, "the Site") as identified in the Notification [2].

2. The Town of Cheshire ("the Town") shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.

3. In the event that the decontamination and disposal plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.

4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.

5. The Town must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during implementation of these cleanup activities, the Town shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.

6. The Town is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the Town has or receives information indicating that the Town or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.

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[2] Information was prepared by AECOM on behalf of the Town of Cheshire to satisfy the requirements under 40 CFR § 761.61(c) and § 761.79(h). Information was submitted dated March 28, 2014 (Building Materials Remedial Action Plan); July 28, 2014 (response to EPA comments dated May 14, 2014); August 25, 2014 (emails response to EPA comments); August 26, 2014 (emails response to EPA comments); August 28, 2014 (email revised Table 2); and September 2, 2014 (email revised Table 2). These submittals shall be referred to as the "Notification".

7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the Town are authorized to conduct the activities set forth in the Notification. The Town is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the Town from compliance with any applicable requirements of federal, state or local law; or 3) release the Town from liability for, or otherwise resolve any violations of federal, state or local law.

NOTIFICATION AND CERTIFICATION CONDITIONS

9. This Approval may be revoked if the EPA does not receive written notification from the Town of its acceptance of the conditions of this Approval within 10 business days of receipt.

10. The Town shall submit the following information for EPA review and/or approval:

    a. a certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;

    b. a contractor work plan, prepared and submitted by the selected demolition or abatement contractor(s) describing the methods and means of paint and caulk removal, and the containment and air monitoring that will be employed during abatement activities. This work plan should also include information on how and where wastes will be stored and disposed of, and on how field equipment will be decontaminated; and,

    c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

DECONTAMINATION AND DISPOSAL CONDITIONS

11. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools or construction of a negative air containment system with a HEPA ventilation system to control emissions, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.

12. All visible residues of PCB-contaminated caulk and paint (i.e., *PCB bulk product waste*) shall be removed as described in the Notification.

13. The PCB decontamination standard for *porous surfaces* shall be less than or equal to ("≤") 1 part per million ("ppm") PCBs or alternatively shall be encapsulated as described in the Notification (see Attachment 2).

    a. All post-decontamination verification sampling of *porous surfaces* shall be performed on a bulk basis (i.e., mg/Kg). Verification samples shall be collected in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches.

    b. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.

14. The following requirements shall apply to PCB-contaminated *non-porous surfaces* (i.e., exterior fascia panels, see Attachment 2):

    a. The decontamination surface wipe standard for *non-porous surfaces* shall be ≤ 10 µg/100 cm^2 PCBs.

    b. All post-decontamination sampling of *non-porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e., µg/100 cm^2) and in accordance with Notification.

    c. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction and/or analytical method(s) is validated according to Subpart Q.

    d. For decontaminated *non-porous surfaces* that have PCB concentrations exceeding the decontamination standard, the Town may conduct additional decontamination to achieve the required decontamination standard or the Town shall store and dispose of these materials as TSCA-regulated waste in accordance with 40 CFR Part 761.

15. Following encapsulation of PCB-contaminated *porous surfaces,* the following initial sampling shall be conducted to determine the effectiveness of the encapsulation.

    a. Wipe sampling of encapsulated *porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. µg/100 cm^2) and at the frequency detailed in the Notification (see Attachment 2).

        i) Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.

        ii) In the event that the PCB concentration of any wipe sample result is > 1 µg/100 cm^2, the Town shall contact EPA for further discussion and direction on alternatives.

    b. Indoor air sampling shall be conducted in accordance with EPA Method TO-10A or EPA Method TO-4A. Sufficient sample volumes shall be collected to provide a laboratory reporting limit of ≤ 0.050 µg/m^3. PCB analysis shall be conducted for PCB homologues and/or PCB congeners by EPA Method 680 or EPA Method 1668.

        i) In the event that the PCB concentration of any air sample result is > 0.40 µg/m^3, the Town shall contact EPA for further discussion and direction on what, if any, additional requirements shall apply to the Site.

16. The Town shall submit to EPA a proposed long-term monitoring and maintenance plan ("MMP") for encapsulated surfaces and indoor air in accordance with Condition 22.

17. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with CFR 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.

    a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).

    b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).

    c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

DEED RESTRICTION AND USE CONDITIONS

18. Within sixty (60) days of completing the activities described in the Notification and authorized in the Approval, the Town shall submit for EPA review and approval, a draft deed restriction for the Site. The deed restriction shall include: a description of the extent and levels of contamination at the Site following the remedial work; a description of the actions taken at the Site; a description of the use restrictions for the Site; and the long-term monitoring and maintenance requirements on the Site, which may be addressed in the monitoring and maintenance plan (MMP, see Condition 22). Within seven (7) days of receipt of EPA's approval of the draft deed restriction, the Town shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

SALE, LEASE OR TRANSFER CONDITIONS

19. The Site owner shall notify the EPA of the sale, lease or grant of any real estate interest in the Site, in writing, no later than sixty (60) days prior to such action. This notification shall include the name, address, and telephone number of the new owner(s). In the event that the Site owner sells, leases, or grants any real estate interest affecting a portion of the Site, the Site Owner shall continue to be bound by all the terms and conditions of this Approval, unless EPA allocates some or all of this Approval's responsibilities to the new owner(s), lessee or grantee. The notification procedures are as follows:

    a. The new owner(s), lessee or grantee must request, in writing, that the EPA transfer some or all obligations and responsibilities under the Approval to the new owner(s), lessee or grantee;

    b. The EPA reviews the request, and determines whether to allocate some or all of the obligations and responsibilities under the Approval to the new owner(s), lessee, or grantee; and,

    c. The new owner(s), lessee or grantee provides written notification to the EPA of its acceptance of and intention to comply with the terms and conditions of the Approval or new approval, should EPA deem a new approval is necessary. The Approval or new approval may be withdrawn if the EPA does not receive written notification from the new owner(s), lessee or grantee of its acceptance of, and intention to comply with, the terms and conditions of the Approval or new approval within thirty (30) days of its receipt of the Approval or the new approval. Under such circumstances, all terms and conditions of this Approval will continue to be binding on the Site owner.

20. In the event that the sale, lease or grant of a real estate interest in the Site will involve or result in a change in the use of the Site, EPA may revoke, suspend, and/or modify this Approval or the new approval if it finds, due to the change in use, that this risk-based cleanup and disposal action will not be protective of health or the environment. The new owner or grantee shall record any amendment to the deed restriction, resulting from any approved modification(s), within sixty (60) days of such change(s).

21. In any sale, lease or grant of a real estate interest in the Site, the Site owner shall retain sufficient access rights to enable it to continue to meet its obligations under this Approval, except as provided above.

INSPECTION, MONITORING, MODIFICATION AND REVOCATION CONDITIONS

22. Within 90 days of completion of the work authorized under this Approval, the Town shall submit for EPA's review and approval, a detailed MMP for the surface encapsulants and barriers and for indoor air monitoring, as applicable. The Town shall incorporate any changes to the MMP required by EPA.

    a. The MMP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols, sampling frequency, and analytical criteria; and reporting requirements.

    b. The MMP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including building users, other on-site workers, and interested stakeholders.

    c. The MMP also shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the building coatings/barriers.

    d. The Town shall submit the results of these long-term monitoring and maintenance activities to EPA. Based on its review of the results, EPA may determine that modification to the MMP is necessary in order to monitor and/or evaluate the long-term effectiveness of the coatings and/or barriers.

    e. Activities required under the MMP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.

    f. A copy of the MMP shall be attached to the deed restriction, see Condition 18.

23. The Town shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the Town to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

24. Any modification(s) in the plan, specifications, or information submitted by the Town, contained in the Notification, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. The Town shall inform the EPA of any modification, in writing, at least ten (10) days prior to such change. No action may be taken to implement any such modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification.

25. If such modification involves a change in the use of the Site which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from the Town to make a determination regarding potential risk.

26. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

RECORDKEEPING AND REPORTING CONDITIONS

27. The Town shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the decontamination and the analytical sampling shall be established and maintained by the Town in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.

28. As required under Condition 22 of this Approval, the Town shall submit the results of the long-term monitoring and maintenance activities to EPA as specified in the final MMP to be approved by EPA.

29. The Town shall submit a Final Completion Report (Report) in both hard copy and electronic copy to the EPA within 120 days of completion of the activities described under this Approval. At a minimum, this Report shall include: a discussion of the project activities with photo documentation, including any modifications that were made to the plan; characterization and post-abatement sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCBs removed and disposed off-site; copies of manifests and/or bills of lading; and, copies of certificates of disposal or similar certifications issued by the disposer, if applicable.

30. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100 (OSRR07-2)
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

31. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

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END OF ATTACHMENT 1

Revised Table 2

Regulated Materials, Verification Sampling and Remedial Actions

Town of Cheshire WPCP

Regulated Material	Installation (LF/SF)	Regulatory Classification	Total Number of Verification Samples	Remedial Action/Sampling Description
Influent Pump Station				
Exterior Caulk (windows, doors, louvers)	240 LF	PCB Bulk Product	4[2] Brick/ 3[3] Concrete	Caulk will be removed and brick that was in contact with the caulk will be encapsulated or covered with a solid barrier a distance of 3" from the original caulk joint. Concrete foundation slab will be encapsulated or covered with a solid barrier a distance of 9" from the caulk joint. Characterization samples were collected of brick beneath caulk and results presented in Table 3 attached to the Response to Comments with sample results >1 mg/kg. Four samples collected of brick 3" from caulk seam reported in Table 1 of the remedial plan with all results <0.1 mg/kg. No additional brick sampling to be performed. Six samples to be collected of foundation concrete where window caulk is at contact with this concrete. Three characterization samples will be collected at the point of contact (0)" and three verification samples will be collected 9" from location of caulk joint to confirm the limit of encapsulation. EPA will be contacted for an approval of a modification if analytical results indicates that a modification is required.
Interior Caulk (windows, doors, louvers)	240 LF	PCB Bulk Product	None[1]	See Interior Wall Paint for Remedial Action. Two characterization samples were collected of CMUs beneath caulk and results presented in Table 3 attached to the Response to Comments and both samples with total PCB results >1 mg/kg. No additional samples will be collected.
Exterior Fascia Panels (Caulk on Panel Face)	50	PCB Bulk Product	None	Panels will be removed, no verification sampling, dispose as PCB Bulk Product Waste.
Exterior Fascia Panels (Caulk on Soffit)	160 LF	PCB Bulk Product	3[3]	Caulk will be removed and brick that was in contact with the caulk will be encapsulated or covered with a solid barrier a distance of 3" from the original caulk joint. Soffit panels will be removed and disposed as PCB Bulk Product Waste. Two characterization samples were collected of brick beneath caulk and results presented in Table 3 attached to the Response to Comments with sample results >1 mg/kg. Three verification samples to be collected during remediation to determined that encapsulation is complete. EPA will be contacted for an approval of a modification if analytical results indicates that a modification is required.
Electrical Penetration Caulk	2 Locations	State Regulated	1[2]	Remove caulk. One verification sample was collected of brick beneath caulk and results presented in Table 3 attached to the Response to Comments with sample result ND (<0.10 mg/kg). No additional samples to be collected.
Chimney Caulk	10 LF	State Regulated	1[2]	Remove caulk. One verification sample was collected of brick beneath caulk and results presented in Table 3 attached to the Response to Comments with sample result ND (<0.10 mg/kg). No additional samples to be collected.
Interior Wall Paint (walls not to be demolished)	1,560 SF	PCB Bulk Product	None[1]	Paint will be removed from the wall structures and the walls will be encapsulated or covered with a solid barrier. Two characterization samples were collected of CMU beneath paint and results presented in Table 3 attached to the Response to Comments with sample results >1 mg/kg. Six additional characterization samples of CMU beneath paint will be collected.
Interior Wall Paint (walls to be demolished)	590 SF	PCB Bulk Product	None	Demolish walls, no verification sampling, dispose as PCB Bulk Product Waste.
Ceiling Paint	1,300 SF	State Regulated	2[2]	Remove paint. Two verification samples were collected of concrete beneath paint and results presented in Table 3 attached to the Response to Comments and both samples with total PCB results <0.11 mg/kg. No additional samples will be collected.

Attachment 2, Page 1

Revised Table 2 (continued)

Regulated Materials, Verification Sampling and Remedial Actions

Town of Cheshire WPCP

Regulated Material	Installation (LF/SF)	Regulatory Classification	Total Number of Verification Samples	Remedial Action/Sampling Description
Influent Pump Station (continued)				
Soil	NA	PCB Remediation	Subpart O	Soil excavation followed by verification sampling by Subpart O. A minimum of three samples will be collected of each material encountered in the excavation. Materials that may be within the excavation include concrete (building foundation), soil, and asphalt (paved areas)
Post-Encapsulation Sampling	TBD	Remediation Exposure Barrier Installed on Surfaces	1/1,000 SF	Total surface area to be encapsulated with two coats of an epoxy paint will be submitted with the Contractor's Work Plan. 1 wipe sample will be collected per every 1,000 SF (or 3 minimum) of area coated with an encapsulant to determine that encapsulant materials are clean at the time of application (<1 µg/100 cm^2).
Digestion Control Building				
Exterior Caulk (windows, doors, louvers)	120 LF	PCB Bulk Product	4 Brick[2]/ 3 Concrete[3]	Caulk will be removed and brick that was in contact with the caulk will be encapsulated or covered with a solid barrier a distance of 3" from the original caulk joint. Concrete foundation slab will be encapsulated or covered with a solid barrier a distance of 9" from the caulk joint. Characterization samples were collected of brick beneath caulk and results presented in Table 3 attached to the Response to Comments with sample results >1 mg/kg. No additional characterization sampling will be performed. Four verification samples collected of brick 3" from caulk seam and reported in Table 1 of the remedial plan with all PCB results <0.2 mg/kg and no additional verification sampling will be performed. Six samples to be collected of foundation concrete where window caulk is at contact with this concrete. Three samples will be collected at the point of contact (0)" and three samples will be collected 9" from location of caulk joint to dconfirm the limit of encapsulation. EPA will be contacted for an approval of a modification if analytical results indicates that a modification is required.
Interior Caulk (windows, doors, louvers)	120 LF	PCB Bulk Product	None[1]	See Interior Wall Paint for Remedial Action. Two samples were collected of CMUs beneath caulk and results presented in Table 3 attached to the Response to Comments and both samples with total PCB results >1 mg/kg. No additional samples will be collected.
Exterior Fascia Panels (Caulk on Panel Face)	50 LF	PCB Bulk Product	4 Wipe Samples[3]	Caulk will be removed and the non-porous materials will be decontaminated. There are 15 total caulk seams on the fascia panels. Four wipe samples will be collected and if wipe sample results are <10 µg/100 cm^2 no additional sampling will be performed. If wipe sample results are >10 µg/100 cm^2 then, all caulk seams will be decontaminated again and eight wipe samples will be collected. If results are still >10 µg/100 cm^2, EPA will be contacted to determine additional actions.
Exterior Fascia Panels (Caulk on Soffit)	130 LF	PCB Bulk Product	3 Brick[2,3]/ 4 Wipe[3]	Caulk will be removed and no encapsulation is proposed. Two verification samples were collected of brick beneath caulk and results presented in Table 3 attached to the Response to Comments with samples results <0.26 mg/kg. One additional sample will be collected during remediation. If sample result is >1 mg/kg, EPA will be contacted for approval of a modification to the remedial plan that will involve encapsulation. 4 wipe samples to be collected of the decontaminated soffit panels and if wipe sample results are <10 µg/100 cm2, no additional sampling to be performed. If wipe sample results are >10 µg/100 cm2 then, all caulk seams will be decontaminated again and eight wipe samples will be collected. If results are still >10 µg/100 cm2, EPA will be contacted to determine additional actions.

Attachment 2, Page 2.

Revised Table 2 (continued)

Regulated Materials, Verification Sampling and Remedial Actions

Town of Cheshire WPCP

Regulated Material	Installation (LF/SF)	Regulatory Classification	Total Number of Verification Samples	Remedial Action/Sampling Description
Digestion Control Building (continued)				
Chimney Caulk	50 LF	PCB Bulk Product	2[3]	Caulk will be removed and brick that was in contact with the caulk will be encapsulated or covered with a solid barrier a distance of 3" from the original caulk joint. One characterization sample at point of contact with total PCB results >1 mg/kg. Two samples to be collected at 3" from caulk seam to confirm limit of encapsulation during remediation. EPA will be contacted for an approval of a modification if analytical results indicates that a modification is required.
Coping Stone Caulk	300 LF	PCB Bulk Product	None	Remove coping stones, caulk, and flashing. No verification samples will be collected because caulk is in contact with coping stone (to be completely removed) and the metal flashing (to be completely removed) which is a non-porous material.
Electrical Penetration Caulk	2 Locations	State Regulated	1[2]	Remove caulk. One verification sample was collected of brick beneath caulk and results presented in Table 3 attached to the Response to Comments with sample result ND (<0.10 mg/kg). No additional verification samples to be collected.
Ceiling Paint	1,600 SF	PCB Bulk Product	None[1]	Paint will be removed from the ceiling and the ceiling will be encapsulated or covered with a solid barrier. Two characterizaiton samples were collected of paint beneath caulk and results presented in Table 3 attached to the Response to Comments with sample results >50 mg/kg. Six additional characterization samples to be collected during remediation.
Interior Wall Paint	2,450 SF	PCB Bulk Product	None[1]	Paint will be removed from the wall structures and the walls will be encapsulated or covered with a solid barrier. Two samples were collected of paint beneath caulk and results presented in Table 3 attached to the Response to Comments with sample results >50 mg/kg. Six additional samples to be collected during remediation.
Post-Encapsulation Sampling	TBD	Remediation Exposure Barrier Installed on Surfaces	1/1,000 SF	Total surface area to be encapsulated with two coats of an epoxy paint will be submitted with the Contractor's Work Plan. 1 wipe sample will be collected per every 1,000 SF (or 3 minimum) of area coated with an encapsulant to determine that encapsulant materials are clean at the time of application (<1 µg/100 cm^2).
Operations Building				
Exterior Caulk (windows, doors, louvers)	775 LF	PCB Bulk Product	4 Brick[2]/ 4 Concrete Sill[2]	Remove caulk. Brick that was in contact with the caulk will be encapsulated or covered with a solid barrier a distance of 3" from the original caulk joint. Concrete window sills will be encapsulated or covered with a solid barrier a distance of 9" from the caulk joint. Two characterizaiton samples were collected of brick beneath caulk and results presented in Table 3 attached to the Response to Comments with sample results >1 mg/kg. Four verification samples were collected of brick 3" from the caulk seam and reported in Table 1 of the remedial plan. No additional sampling of brick is proposed. Four verification samples were collected from the concrete sill 9" from the caulk seam and reported in Table 1 of the remedial plan with all results <0.21 mg/kg. No additional verification sampling of the concrete sill is proposed but two characterization samples will be collected during remediation.

Attachment 2, Page 3

Revised Table 2 (continued)

Regulated Materials, Verification Sampling and Remedial Actions

Town of Cheshire WPCP

Regulated Material	Installation (LF/SF)	Regulatory Classification	Total Number of Verification Samples	Remedial Action/Sampling Description
Operations Building (continued)				
Interior Caulk (windows, doors, louvers)	775 LF	PCB Bulk Product	3 CMU[3]/ 3 Glazed Block[3]	Caulk will be removed. Interior CMUs that were in contact with the caulk will be encapsulated or covered with a solid barrier a distance of 9" from the caulk joint. Interior glazed block that was in contact with the caulk will be covered with a solid barrier a distance of 9" from the caulk joint. For CMUs in contact with window, door, or louver caulk, three verification samples will be collected during remediation a distance of 9" from the caulk seam to to confirm the limit of encapsulation. EPA will be contacted for an approval of a modification if analytical results indicates that a modification is required. For glazed block in contact with window, door, or louver caulk, three verification samples will be collected during remediation a distance of 9" from the caulk seam to to confirm the limit of encapsulation. EPA will be contacted for an approval of a modification if analytical results indicates that a modification is required.
Exterior Fascia Panels (Caulk on Panel Face)	100	PCB Bulk Product	8 Wipe Samples[3]	Caulk will be removed and the non-porous materials will be decontaminated. There are 30 total caulk seams on the fascia panels. Eight wipe samples will be collected and if results are <10 µg/100 cm^2 then no additional sampling to be performed. If wipe sample results are >10 µg/100 cm^2 then, all caulk seams will be decontaminated again and sixteen wipe samples will be collected. If results are still >10 µg/100 cm^2, EPA will be contacted to determine additional actions.
Exterior Fascia Panels (Caulk on Soffit)	430 LF	PCB Bulk Product	5 Brick[3]/ 8 wipe[3]	Caulk will be removed and brick that was in contact with the caulk will be encapsulated or covered with a solid barrier a distance of 3" from the original caulk joint. Two characterizaiton samples collected of brick beneath caulk and results presented in Table 3 attached to the Response to Comments with sample result of 1 mg/kg. No additional characterization sampling proposed. Eight verification samples of brick will be collected a distance of 3" from the caulk seam to confirm the limit of encapsulation. EPA will be contacted for an approval of a modification if analytical results indicates that a modification is required. 8 wipe samples to be collected of the decontaminated soffit panels and if wipe sample results are <10 µg/100 cm2, no additional sampling to be performed. If wipe sample results are >10 µg/100 cm2 then, all caulk seams will be decontaminated again and 16 wipe samples will be collected. If results are still >10 µg/100 cm2, EPA will be contacted to determine additional actions.
Shop Room Paint	1,500 SF	State Regulated	2[2]	Remove paint. Two verification samples were collected of concrete beneath paint and results presented in Table 3 attached to the Response to Comments and both samples with total PCB results <0.43 mg/kg. No additional verification samples will be collected.
Asphalt	NA	PCB Remediation	Subpart O	Asphalt excavation followed by verification sampling by Subpart O. A minimum of three samples will be collected of each material encountered in the excavation. Materials that may be within the excavation include concrete (building foundation), soil, and asphalt (paved areas)
Post-Encapsulation Sampling	TBD	Remediation Exposure Barrier Installed on Surfaces	1/1,000 SF	Total surface area to be encapsulated with two coats of an epoxy paint will be submitted with the Contractor's Work Plan. 1 wipe sample will be collected per every 1,000 SF of area coated with an encapsulant to determine that encapsulant materials are clean at the time of application (<1 µg/100 cm^2).

Notes: [1] - Interior CMUs or ceiling impacted by PCBs from application of PCB Bulk Product Waste Paint. Entire surface areas impacted by PCBs will be encapsulated.

[2] - Existing verification sample data already reported to be used.

[3] - Additional verification sampling to be performed during remediation.

NA - not applicable

TBD - to be determined

LF - linear feet

SF - square feet

Response to Comments - Response to EPA comments on Cheshire WPCP submitted July 28, 2014.

Attachment 2, Page 4.